

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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State Farm Fire and Casualty  
Company,

Case No. 18-cv-222 PAM/SER

Plaintiff,

vs.

Debra Geister; Andy Smit; Navigator  
Consulting Group, LLC; and Exzac,  
Inc. d/b/a Matrix-IFS,

**PLAINTIFF STATE FARM FIRE AND  
CASUALTY COMPANY'S  
CONSOLIDATED MOTION FOR  
DEFAULT JUDGMENT AGAINST  
DEFENDANTS DEBRA GEISTER,  
NAVIGATOR CONSULTING GROUP,  
LLC, AND EXZAC INC., D/B/A  
MATRIX-IFS**

Defendants.

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**MOTION**

State Farm Fire and Casualty Company ("State Farm"), by its counsel, moves for default judgment against Defendants Debra Geister ("Geister"), Navigator Consulting Group, LLC ("Navigator"), and Exzac, Inc. d/b/a Matrix-IFS ("Exzac"), and respectfully requests that the Court, under Fed. R. Civ. P. 55(b)(2), enter judgment by default against Geister, Navigator, and Exzac. The motion is based upon all the files, records, pleadings, and proceedings and the arguments of counsel.

Dated: November 16, 2018

**HKM, P.A.**

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